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12 Attorneys for Plaintiff TRAVELERS PROPERTY CASUALTY COMPANY OF AMERICA

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14 **UNITED STATES DISTRICT COURT**
NORTHERN DISTRICT OF CALIFORNIA

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16 TRAVELERS PROPERTY CASUALTY
COMPANY OF AMERICA,

17 Plaintiff,

18 v.
19 QBE SPECIALTY INSURANCE COMPANY,
20
Defendant.

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Case No.: 3:15-cv-00255-JCS
Magistrate Judge: Joseph C. Spero

**STIPULATION TO EXTEND TIME TO
RESPOND TO FIRST AMENDED
COMPLAINT [L.R. 6-1(a)]**

Service Date: January 29, 2015
Current Response Due: February 12, 2015
New Response Date: March 6, 2015

22 TO THE HONORABLE COURT, ALL PARTIES AND TO THEIR ATTORNEYS OF
23 RECORD:

24 Plaintiff Travelers Property Casualty Company of America ("Travelers") and Defendant QBE
25 Specialty Insurance Company ("QBE"), by and through their respective counsel, hereby submit the following
26 Stipulation with respect to the deadline for QBE to respond to the First Amended Complaint for: Declaratory
27 Relief and Equitable Contribution ("First Amended Complaint") filed by Travelers in this matter on January
28 28, 2015.

1 WHEREAS, the summons and original complaint in this matter were served on QBE's agent for
2 service of process on January 21, 2015.

3 WHEREAS, the First Amended Complaint was served on QBE's agent for service of process on
4 January 29, 2015, making QBE's response to the First Amended Complaint due on February 12, 2015;

5 WHEREAS, Travelers and QBE have agreed that QBE may have an extension of time to respond to
6 Travelers' First Amended Complaint;

7 THEREFORE, Travelers and QBE hereby stipulate and agree that the deadline for QBE to respond
8 to Travelers' First Amended Complaint shall be March 6, 2015.

9 Date: March 6, 2015

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Date: March 6, 2015

MORALES FIERRO & REEVES

OC #51435

Dated: 3/10/15



By: /s/ Ryan B. Luther
Linda Bondi Morrison, Esq.
Ryan B. Luther, Esq.
Attorneys for Defendant QBE SPECIALTY
INSURANCE COMPANY

By: /s/ Ramiro Morales¹
Ramiro Morales, Esq.
W. Brian Jones, Esq.
Attorneys for Plaintiff TRAVELERS PROPERTY
CASUALTY COMPANY OF AMERICA

¹ Mr. Morales, counsel for Travelers, has confirmed that Travelers concurs with the content and filing of this Stipulation.

CERTIFICATE OF SERVICE

Travelers Property Casualty Company of America v. QBE Specialty Insurance Company
United States District Court – Northern District of California
Case No.: 3:15-cv-00255-JCS

I hereby certify that I electronically filed the foregoing with the Clerk of the Court for the United States District Court, Northern District of California, by using the District Court's CM/ECF electronic filing system on **March 6, 2015**.

I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the District Court's CM/ECF electronic filing system.

By: /s/ Ryan B. Luther
Ryan B. Luther, Esq.